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11 *Attorneys for Defendants*

12 UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

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17 IN RE: UBER TECHNOLOGIES, INC.,  
18 PASSENGER SEXUAL ASSAULT  
19 LITIGATION

20 This Document Relates to:

21 ALL ACTIONS

22 Case No. 3:23-md-03084-CRB (LJC)

23 **DECLARATION OF ALEXANDRA CARITIS  
IN SUPPORT OF DEFENDANTS UBER  
TECHNOLOGIES, INC., RASIER, LLC, AND  
RASIER-CA, LLC'S MOTION TO STRIKE  
SUPPLEMENTAL REPORT OF MINETTE  
E. DRUMWRIGHT, PH.D.**

24 **[PURSUANT TO FED. R. CIV. P. 37 AND L.R.  
37-1]**

25 Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Alexandra Caritis, declare as follows:

2 1. I am an attorney licensed to practice law in the State of Texas and admitted pro hac vice in  
3 this action. I am a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants  
4 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I make this declaration  
5 of my own personal knowledge in support of Uber’s Motion to Strike Supplemental Report of Minette E.  
6 Drumwright, Ph.D. If called as a witness, I could and would competently testify to the matters set forth  
7 herein. I have knowledge of the facts set forth herein, and if called to testify as a witness, could do so  
8 competently under oath.

9 2. Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37-1, in an effort to seek  
10 Plaintiffs’ agreement to the relief sought in the above-referenced discovery motion, counsel for Uber  
11 initiated a meet-and-confer process.

12 3. On October 29, 2025, I sent an email to Rachel Abrams, Esq. of Peiffer Wolf Carr Kane  
13 Conway & Wise, LLP, who serves as the Court-appointed Co-Lead Counsel for Plaintiffs in this  
14 proceeding, and Ellyn Hurd, Esq. of Simmons Hanly Conroy LLP, a member of the Court-appointed  
15 Federal/State Liaison Counsel Committee, requesting a telephone call regarding Uber’s anticipated  
16 Motion to Strike Supplemental Report of Minette E. Drumwright, Ph.D.

17 4. Following that email, also on October 29, 2025, I conferred via telephone with Ms.  
18 Abrams regarding the anticipated motion.

19 5. Following my telephonic meet-and-confer with Ms. Abrams, she sent an email to me,  
20 copied to additional counsel for Plaintiffs who hold leadership roles in this proceeding, setting forth her  
21 understanding of Uber’s anticipated motion and indicating that Plaintiffs disagree with Uber’s position.

22 I declare under penalty of perjury under the laws of the United States and the State of California  
23 that the foregoing is true and correct.

24 Executed on October 30, 2025, in Houston, TX.

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2 /s/ Alexandra Caritis  
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Alexandra Caritis

1 **E-FILING ATTESTATION**  
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I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

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7 */s/ Laura Vartain Horn*  
Laura Vartain Horn  
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